

MEMORANDUM



TO: Diana Kennedy (Ofcom)
Reuben Braddock (Ofcom)

FROM: Steve Benton (TSG)

COPY: Dick Parson (TSG)

DATE: 21/09/06

REF: C17/A SRB210906

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SUBJECT: Ofcom's proposed Modifications to Spectrum Pricing / Trading & Liberalisation

Although the formal consultation has now ended I understand that a concession was granted by Paul Jarvis at the JAG meeting on Tuesday 12/09/06 whereby affected licensees further contributions would still be accepted up to one week later.

I would like to highlight the following main points across both documents, which I believe, are of particular note:

- Licensees subject to large increases ought to have them capped or retain reserve rights to the current fee (for say 5 years after the introduction of the new regulations?)
- The technically assigned licence regime mitigates against spectrum efficient trunked radio systems as used by the utilities and transportation.
- Licensees must be able to buy area licences in smaller lots than England, Wales, Scotland or Northern Ireland. Suggest we can buy the 50kmx50km trading square directly, or other regionally defined areas.
- Must be able to have an Agent's licence details in the public licensing database to avoid exposing sensitive assignment details.

I trust that you will consider the above points and give them your due consideration when considering licensees responses to your consultation.